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Attorneys for Movant
Citigroup Mortgage Loan Trust 2022-RP3

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF HAWAII**

In re:

ANTONIO PUZON MACADAEG,

Debtor.

Case No. 24-01159
(Chapter 13)

Hearing:

Date: July 14, 2025

Time: 9:30 AM

Judge: Honorable Robert J. Faris

MOTION FOR RELIEF FROM AUTOMATIC STAY

Citigroup Mortgage Loan Trust 2022-RP3 (“Movant or Creditor”)¹ will and

¹ This Motion for Relief from Automatic Stay shall not constitute a waiver of the within party’s right to receive service pursuant to Fed. R. Civ. P. 4, made applicable to this proceeding by Fed. R. Bankr. P. 7004, notwithstanding Aldridge Pite, LLP’s participation in this proceeding. Moreover, the within party does not authorize Aldridge Pite, LLP, either expressly or impliedly through Aldridge Pite, LLP’s participation in this proceeding, to act as its agent for purposes of service under Fed. R. Bankr. P. 7004.

hereby does move, pursuant to 11 U.S.C. § 362(d) and Rule 4001 of the Federal Rules of Bankruptcy Procedure, for an order terminating the automatic stay of 11 U.S.C. § 362(a) as it applies to Movant and the real property located at 94 1033 Oli Place C3, Waipahu, HI 96797 ("Property").

Movant requests that Movant and/or its successors and assignees may, at its option, offer, provide and enter into a potential forbearance agreement, loan modification, refinance agreement or other loan workout/loss mitigation agreement, including a short sale or deed in lieu as alternatives to foreclosure, and that Movant may contact the Debtor via telephone or written correspondence to offer such an agreement or loan workout option.

Attached are redacted copies of any documents that support the claim, such as promissory notes, purchase order, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements in support of right to seek a lift of the automatic stay and foreclose if necessary.

This Motion is based on the Notice of Hearing, Memorandum of Points and Authorities in Support of Motion for Relief from Automatic Stay, and Declaration in Support of Motion for Relief from Automatic Stay filed concurrently herewith, the pleadings and papers on file herein, and upon such oral and documentary evidence as may be presented by the parties at the hearing.

ALDRIDGE PITE, LLP

Dated: June 10, 2025

/s/ Ken Ohara
KEN OHARA
Attorneys for Movant Citigroup
Mortgage Loan Trust 2022-RP3